

5

RULES PROCESSING TEAM

OCT 18 2000



October 17, 2000

Department of Interior
Minerals Management Service
Mail Stop 4024
381 Eldon Street
Herndon, Virginia 20170-4817

Chevron U.S.A. Production Company
935 Gravier Street
New Orleans, Louisiana 70112

Mark S. Witten
Senior Advisor, Environmental and Safety
Phone No. 504 592-6336
Fax No. 504 592-6659

Attention: Rules Processing Team

To whom it may concern:

Chevron USA Production Company appreciates having the opportunity to comment on the proposed rule restructuring the requirements for oil and gas drilling operations on the OCS published in the Federal Register on June 21, 2000.

We endorse the effort by the Minerals Management Service in improving the regulatory process by updating the regulations to reflect current drilling technology. Chevron participated in the development of comments offered by the Offshore Operators Committee (OOC) and fully supports the suggestions and recommendations.

We are also opposed to the proposed requirement to install blind-shear rams on all surface-BOP stacks. We concur with the comments and recommendations provided to the MMS from the International Association of Drilling Contractors (IADC). The cost to retrofit existing BOP stacks is not justified by the data presented and does not appear to appreciably reduce the risk of blow-outs, as discussed in the IADC comments.

Again, we appreciate the opportunity to provide comments and your consideration of these comments and recommendations.

Sincerely,

Mark S. Witten